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April 2, 2012

Via Hand Delivery

Karen Majcher
Vice President, High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

FILED/ACCEPTED

APR - 2 2012

Federal Communications Commission
Office of the Secretary

**Re: Annual Compliance Filing of NEP Cellcorp, Inc.
WC Docket No. 09-197**

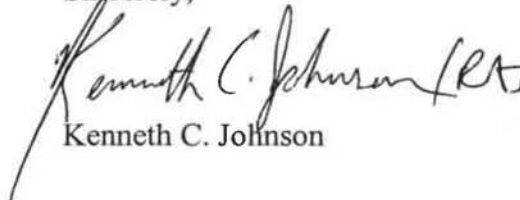
Dear Ms. Majcher:

NEP Cellcorp, Inc. ("NEP"), by its attorneys and pursuant to the Federal Communications Commission's Order designating Advantage as an eligible telecommunications carrier, hereby submits documentation detailing among other things: (1) its progress towards meeting its build-out plans; (2) the number of complaints per 1,000 handsets; and (3) the number of unfulfilled requests for service from potential customers.

Also enclosed is a copy of NEP's compliance filing. Please date-stamp and return the copy to the courier for our records.

If you have any questions regarding this information, please contact the undersigned.

Sincerely,



Kenneth C. Johnson

Enclosures

cc: Marlene H. Dortch, Office of the Secretary
Federal Communications Commission (via hand delivery and electronic filing)

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Federal-State Joint Board on) WC Docket No. 09-197
Universal Service)
)
NEP Cellcorp, Inc.)
)
Application for Designation as an)
Eligible Telecommunications Carrier)
in the State of Pennsylvania)

FILED/ACCEPTED

APR - 2 2012

Federal Communications Commission
Office of the Secretary

ANNUAL COMPLIANCE FILING OF NEP CELLCORP, INC.

NEP Cellcorp, Inc. ("NEP"), by its attorneys, hereby submits its annual compliance filing for Study Area Code 179010 as required by Section 54.209 of the Federal Communications Commission's ("FCC" or "Commission") Rules,¹ the Commission order designating NEP as an eligible telecommunications carrier ("ETC"),² the Commission's *Connect America Fund Order*,³ and the Commission's *Clarification Order*.⁴ Among other things, the *Connect America Fund Order* relocated the current federal annual reporting requirements from Section 54.209(a)(1)-(6) to new Section 54.313 of the Commission's rules and created additional reporting requirements. For ETCs previously designated by the Commission, the *Clarification Order* clarified that, beginning on April 1, 2012, Section 54.313 annual reports will be due annually by April 1 instead of October 1, and provided further guidance pertaining to several additional reporting requirements.

¹ See 47 C.F.R. § 54.209.

² *In the Matter of Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment*, CC Docket No. 96-45, Order, FCC 08-122, ¶¶ 22, 26 and 36 (May 1, 2008) ("*NEP ETC Order*").

³ See *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶¶ 580-581 (rel. Nov. 18, 2011) ("*Connect America Fund Order*").

⁴ See *Connect America Fund et al.*, WC Docket No. 10-90 et al., Order, DA 12-147, ¶¶ 4, 6 (rel. February 3, 2012) ("*Clarification Order*").

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I. Progress Report on Quality Improvement Plan Progress and Use of Support and Additional Five-Year Outlook

Pursuant to Section 54.313(a)(1) of the Commission's rules, NEP hereby provides at the wire center level a progress report on its five-year service quality improvement plan, including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled.⁵

[illegible]

[REDACTED] A map of NEP's ETC boundaries and NEP's coverage in its license area is attached hereto as Exhibit A.

⁵ 47 C.F.R. § 54.313(a)(1).

II. Outage Report

Pursuant to Section 54.313(a)(2) of the Commission's rules, NEP hereby provides detailed information on outages of at least 30 minutes in duration for the prior calendar year for each service area in which NEP designated potentially affecting (i) at least 10 percent of end users in a designated area or (ii) a 911 special facility.⁶

Since July 1, 2011, NEP had zero reportable service outages pursuant to the Commission's *Outage Reporting Order*⁷ and Section 4.5(e) of the Commission's rules.⁸ NEP recently completed its transition to the hosted platform of the new switching provider in September 2011. NEP performs routine maintenance checks on its system to ensure quality service. In order to perform these maintenance checks, NEP must turn off its service for a maximum of two to three minutes. NEP performs these checks at night during periods of very low call volume so as not to interrupt service. Except in emergency situations, NEP notifies its customers in advance of the maintenance check and possible service disruptions.

On Wednesday, March 21, 2012, NEP experienced some inconsistencies with service due to a MUX failing. All services were not down, but NEP experienced traffic overflows on its Voice interconnect trunking. The issue was resolved and an action plan was put in place to diversify these connections to reduce the possibilities of future issues.

III. Service Requests

Pursuant to Section 54.313(a)(3) of the Commission's rules, NEP hereby provides the number of requests for service from potential customers within NEP's service areas that were unfulfilled during the

⁶ See 47 C.F.R. § 54.313(a)(2).

⁷ See *New Part 4 of the Commission's Rules Concerning Disruptions to Communications Report and Order and Further Notice of Proposed Rulemaking*, 199 FCC Rcd 16830, 16923-24, § 4.5 (2004) ("*Outage Reporting Order*"). See also 47 C.F.R. § 54.209(a)(2).

⁸ See 47 C.F.R. § 4.5(e).

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prior calendar year.⁹ Since July 1, 2011, NEP did not have any unfulfilled service requests from potential customers.

IV. Number of Complaints Per 1,000 Handsets or Lines

Pursuant to Section 54.313(a)(4) of the Commission's rules, NEP hereby provides the number of complaints per 1000 fixed or mobile connections in the prior calendar year.¹⁰ Since July 1, 2011, NEP received no complaints filed with the FCC or the Pennsylvania Public Utility Commission.

V. Price Offerings

Pursuant to Section 54.313(a)(7) of the Commission's rules, NEP will be required to report its price offerings in a format to be specified by the Wireline Competition Bureau ("WCB").¹¹ Because this rule has not yet taken effect pending approval by the Office of Management and Budget ("OMB"), NEP will provide its price offering information in the required format by the as-yet established deadline following the rule's effective date.

VI. Ownership Report

Pursuant to Section 54.313(a)(8) of the Commission's rules, NEP will be required to report its holding company, operating companies, affiliates and any branding (e.g., a "dba" or "doing-business-as" company or brand designation), including universal service identifiers for each such entity by Study Area Codes.¹² Because this rule has not yet taken effect pending approval by OMB, NEP will provide this ownership information by the as-yet established deadline for 2012 following the rule's effective date. Furthermore, the Commission's *Clarification Order* indicates that it will provide affected ETCs sufficient time after such approval is obtained to file the required information.¹³

⁹ See 47 C.F.R. § 54.313(a)(3).

¹⁰ See 47 C.F.R. § 54.313(a)(4).

¹¹ See 47 C.F.R. § 54.313(a)(7).

¹² See 47 C.F.R. § 54.313(a)(8).

¹³ See *Clarification Order* at ¶ 12.

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VII. Tribal Lands Report

Pursuant to Section 54.313(a)(9) of the Commission's rules, NEP will be required to provide, to the extent that it serves Tribal lands, documents or information demonstrating that NEP had certain discussions with Tribal governments regarding, among other things, needs assessment and deployment planning; feasibility and sustainability planning; marketing services; and rights of way processes.¹⁴ However, the Commission's *Clarification Order* indicates that the Commission requires more time to finalize processes to guide support recipients in such engagements, and the Commission amended the rule to provide that the initial deadline for reporting information pursuant to Section 54.313(a)(9) is April 1, 2013.¹⁵

VIII. Certifications

Pursuant to Sections 54.313(a)(5)-(6) of the Commission's rules,¹⁶ attached hereto are certifications attesting that NEP: (1) complies with applicable service quality standards and consumer protection rules; and (2) is able to function in emergency situations as set forth in Section 54.202(a)(2) of the Commission's rules. Certifications that were previously required pursuant to Sections 54.313(a)(7) and Sections 54.313(a)(8) were not relocated to new Section 54.313 of the Commission's rules and therefore are not required in the instant filing.

¹⁴ See 47 C.F.R. § 54.313(a)(9).

¹⁵ See *Clarification Order* at ¶ 11.

¹⁶ See 47 C.F.R. § 54.313(a)(5)-(6).

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IX. Conclusion

Based on the foregoing information, NEP hereby satisfies its annual reporting requirements set forth in the *Designation Order*, *Connect America Fund Order*, *Clarification Order* and Section 54.313 of the Commission's rules and maintains its continued eligibility to receive federal universal service support.

Respectfully submitted,

NEP CELLCORP, INC.

By:



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(202) 551-0015

Its Attorneys

Dated: April 1, 2012

Declaration of Rick Kulasinsky

I, Rick Kulasinsky, do hereby declare under penalty of perjury the following:

1. I am the Wireless Engineering & Operations Manager at NEP Cellcorp, Inc.
2. I have read the foregoing "Annual Compliance Filing of NEP Cellcorp, Inc."
I have personal knowledge of the facts set forth therein, and believe them to be true and correct.


Rick Kulasinsky

3-27-2012
Date

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EXHIBIT A

REDACTED